

# **Exhibit 3**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, et al.

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as Texas  
Secretary of State and STEVEN C. MCCRAW, in  
his official capacity as Director of the Texas  
Department of Public Safety

Defendants.

Civil Action Case No. 5:20-cv-00046-  
OLG

**DECLARATION OF JACQUI NEWMAN IN SUPPORT OF PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT AND IN OPPOSITION TO DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT**

Pursuant to 20 U.S.C. § 1746, I, Jacqui Newman, testify that:


1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.
2. I currently serve as the Deputy Executive Director and Chief Operating Officer of the DCCC.
3. DCCC has spent significant resources on voter registration during this election cycle, and in past election cycles.
4. On November 19, 2019, the DCCC entered into a contract with a consulting firm, Sisneros Strategies, to perform paid canvassing services to register voters in Congressional District 23. DCCC staff also attended trainings provided by Sisneros Strategies to learn how to register voters in Texas. I personally executed the agreement with Sisneros Strategies on behalf of the DCCC.
5. The DCCC has paid Sisneros Strategies a fee of \$367,250 to provide the services described above. *See Attachment A.*

6. Sisneros Strategies targeted its efforts at registering unregistered U.S. citizens with eligibility in Congressional District 23. Sisneros Strategies registered voters in various public places, including on college campuses and outside of Department of Public Safety (“DPS”) offices in Congressional District 23.
7. When Sisneros Strategies conducted voter registration activities in Texas on behalf of DCCC, Sisneros Strategies informed voters (as a matter of general practice) that if they updated their driver’s license information online via the DPS website, doing so would not automatically register them to vote or update their voter registration information. Sisneros Strategies spent time and resources registering voters who could have otherwise updated their voter registration online via the DPS website.
8. Sisneros Strategies did not ask for party affiliation when registering voters.
9. DCCC hired Sisneros Strategies to help DCCC register voters in Texas in part because the State of Texas does not provide an opportunity for voters to register to vote or update their voter registration information simultaneously with updates to driver’s license information undertaken online, which DCCC is aware has previously resulted in the disenfranchisement of Democratic voters. DCCC relied on Sisneros Strategies to directly inform voters that changing their address online with DPS would not automatically update their voter registration. DCCC also relied on Sisneros Strategies to train DCCC staff and make them aware of this risk of disenfranchisement when registering voters.
10. DCCC staff members work out of four DCCC offices in Texas. DCCC staff in Texas engage in voter registration and have been trained by Sisneros Strategies on how to properly register voters in Texas. DCCC staff focus on registering Democratic voters who have recently moved, including college students, who are likely to vote Democratic.
11. When registering voters, DCCC staff inform voters that updating driver’s license information online via the DPS website does not automatically register them to vote or update their voter registration information. DCCC staff spends time and resources registering voters who could have otherwise updated their voter registration online via the DPS website.
12. DCCC transfers funds to the Texas Democratic Party (“TDP”) to support its voter registration efforts. DCCC understands that TDP field staff are responsible for registering voters across the state of Texas.
13. DCCC invested over \$3.1 million in Texas in the 2014 election cycle. DCCC invested over \$6 million in Texas in the 2016 election cycle. DCCC invested over \$6.7 million in Texas in the 2018 election cycle.
14. If Defendants offered simultaneous voter registration for online DPS transactions, then DCCC would spend the time and resources it currently dedicates to educating its staff, consultants, and voters on how to avoid disenfranchisement as a result of Defendants’ conduct, on more outreach to additional unregistered voters and constituents.

15. Thus far, during this election cycle, the DCCC has spent over \$1.1 million in Texas, and over \$550,000 of that is directly related to voter registration in Texas. During this election cycle, DCCC has thus far transferred over \$180,000 to the TDP. \$145,000 of that amount was given to the TDP to support TDP's voter registration efforts.
16. DCCC represents the interests of Democratic voters and donors, and considers them to be its constituents.
17. Democratic voters and constituents provide financial support in the form of political contributions to DCCC and candidates supported by the DCCC on a regular basis, as documents produced by the DCCC in this litigation and publicly available FEC filings demonstrate. *See, e.g.*, ECF No. 85-5 at 22-23; ECF No. 85-6 at 3-4; ECF No. 85-6 at 5-15; ECF No. 85-8 at 16-46. This includes specifically through the Blue Texas Fund, a joint fundraising committee including Colin Allred for Congress, Elizabeth Pannill Fletcher for Congress, and the DCCC. *See* ECF No. 85-8 at 24.
18. Democratic voters help elect the leadership of the DCCC by electing candidates to the United States House of Representatives.
19. Democratic voters participate in DCCC's strategy by responding to surveys and polls, as documents produced by the DCCC in this litigation demonstrate. *See, e.g.*, ECF No. 85-7 at 4-8; ECF No. 85-8 at 15.
20. DCCC considers the individual plaintiffs in this action, John Harms, Jarrod Stringer, and Nayeli Gomez, to be constituents of the DCCC. DCCC represents their interests.
21. I have reviewed the declaration of Ms. Jada Thompson. The DCCC considers Ms. Thompson to be a constituent of the DCCC because she identifies as a Democrat and supports Democratic candidates. DCCC represents Ms. Thompson's interests.
22. As a direct result of Defendant's conduct, Democratic voters like Ms. Thompson and the individual plaintiffs in this lawsuit, have been disenfranchised and unable to cast ballots in support of DCCC's candidates. Defendants' conduct harms DCCC's electoral prospects because it makes it more difficult for DCCC's members and constituents to cast ballots for Democratic candidates that are counted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2020.

DocuSigned by:  
  
09E0A542DF57477...  
Jacqui Newman  
Deputy Executive Director and COO  
DCCC

# Attachment A

Image# 202003029203598336

PAGE 1 / 41517

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

DCCC

ADDRESS (number and street)

430 South Capitol Street, SE

2nd Floor

Check if different  
than previously  
reported. (ACC)

Washington

DC

20003-4024

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00000935

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

☐ April 15  
Quarterly Report (Q1)☐ July 15  
Quarterly Report (Q2)☐ October 15  
Quarterly Report (Q3)☐ January 31  
Year-End Report (YE)☐ July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)☐ Termination Report  
(TER)(b) Monthly  
Report  
Due On:☐ Feb 20 (M2)☐ May 20 (M5)☐ Aug 20 (M8)☐ Nov 20 (M11)  
(Non-Election  
Year Only)☐ Mar 20 (M3)☐ Jun 20 (M6)☐ Sep 20 (M9)☒ Dec 20 (M12)  
(Non-Election  
Year Only)☐ Apr 20 (M4)☐ Jul 20 (M7)☐ Oct 20 (M10)☐ Jan 31 (YE)

(c) 12-Day

PRE-Election  
Report for the:☐ Primary (12P)☐ Convention (12C)☐ General (12G)☐ Special (12S)☐ Runoff (12R)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the  
State of

(d) 30-Day

POST-Election  
Report for the:☐ General (30G)☐ Runoff (30R)☐ Special (30S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the  
State of

5. Covering Period

M M M /

D D D /

Y Y Y Y Y Y Y Y

through

M M M /

D D D /

Y Y Y Y Y Y Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Guinn, Lucinda, , ,

Type or Print Name of Treasurer

Signature of Treasurer

Guinn, Lucinda, , ,

[Electronically Filed]

Date

M M M /

D D D /

Y Y Y Y Y Y Y Y

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office  
Use  
Only**FEC FORM 3X**  
Rev. 05/2016

# **SCHEDULE B (FEC Form 3X)** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 40908 OF 41517

☒ 21b ☐ 22 ☐ 23 ☐ 26 ☐ 27  
☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

**DCCC**

Full Name (Last, First, Middle Initial)

## **A. Thrifty Car Rental**

Mailing Address Dept 1271  
PO Box 121271

City  
Dallas

State  
TX

Zip Code  
75312

Purpose of Disbursement  
Travel

002

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y  
11 / 21 / 2019

FEC Identification Number

C

Transaction ID : SB21B-10012

Amount of Each Disbursement this Period

190.98

☐ Memo Item

Full Name (Last, First, Middle Initial)

## **B. Sisneros Strategies LLC**

Mailing Address 2208 N. Early St.

City  
Alexandria

State  
VA

Zip Code  
22302

Purpose of Disbursement  
Generic Strategic/ Political Consultant

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y  
11 / 21 / 2019

FEC Identification Number

C

Transaction ID : SB21B-10012

Amount of Each Disbursement this Period

146900.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

## **C. Thirty-Ninth St Strategies LLC**

Mailing Address 98-05 67th Avenue, 6J

City  
Rego Park

State  
NY

Zip Code  
11374

Purpose of Disbursement  
Generic Cmte. Polling

005

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y Y  
11 / 21 / 2019

FEC Identification Number

C

Transaction ID : SB21B-10012

Amount of Each Disbursement this Period

13250.00

☐ Memo Item

**SUBTOTAL** of Disbursements This Page (optional)..... ►

**TOTAL** This Period (last page this line number only)..... ►

160340.98

Image# 202005089232624896

PAGE 1 / 5507

**FEC  
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AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

DCCC

ADDRESS (number and street)

430 SOUTH CAPITOL STREET, SE

2ND FLOOR



Check if different than previously reported. (ACC)

WASHINGTON

DC

20003-4024

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00000935

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y Y

in the  
State of

5. Covering Period

M M M /

D D D /

Y Y Y Y Y Y Y Y

through

M M M /

D D D /

Y Y Y Y Y Y Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

GUINN, LUCINDA, , ,

Type or Print Name of Treasurer

Signature of Treasurer

GUINN, LUCINDA, , ,

[Electronically Filed]

Date

M M M /

D D D /

Y Y Y Y Y Y Y Y

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Office  
Use  
Only**FEC FORM 3X**  
Rev. 05/2016



# **SCHEDULE B (FEC Form 3X)** **ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 5193 OF 5507

☒ 21b ☐ 22 ☐ 23 ☐ 26 ☐ 27  
☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

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NAME OF COMMITTEE (In Full)

**DCCC**

Full Name (Last, First, Middle Initial)

**A. JILL NORMINGTON & ASSOC INC NORMINGTON, PETTS & ASSOCIATES**

Date of Disbursement

M M / D D / Y Y Y Y Y Y  
01 / 31 / 2020

Mailing Address 1100 H STREET NW  
SUITE 900

City  
WASHINGTON

State  
DC

Zip Code  
20005

Purpose of Disbursement  
GENERIC CMTE. POLLING

005

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

FEC Identification Number

C

Transaction ID : SB21B-10043

Amount of Each Disbursement this Period

17225.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

**B. SISNEROS STRATEGIES LLC**

Date of Disbursement

M M / D D / Y Y Y Y Y Y  
01 / 31 / 2020

Mailing Address 2208 N. EARLY ST.

City  
ALEXANDRIA

State  
VA

Zip Code  
22302

Purpose of Disbursement  
GENERIC STRATEGIC/ POLITICAL CONSULTANT

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

FEC Identification Number

C

Transaction ID : SB21B-10043

Amount of Each Disbursement this Period

110175.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

**C. JETBRAINS AMERICA, INC.**

Date of Disbursement

M M / D D / Y Y Y Y Y Y  
01 / 31 / 2020

Mailing Address 989 EAST HILLSIDE BLVD  
SUITE 200

City  
FOSTER CITY

State  
CA

Zip Code  
94404

Purpose of Disbursement  
GENERIC CMTE. SUBSCRIPTIONS

Category/  
Type

Candidate Name

Office Sought:

☐ House  
☐ Senate  
☐ President

Disbursement For:

☐ Primary ☐ General  
☐ Other (specify) ▼

State:

District:

FEC Identification Number

C

Transaction ID : SB21B-10043

Amount of Each Disbursement this Period

1194.00

☐ Memo Item

**SUBTOTAL** of Disbursements This Page (optional)..... ►

**TOTAL** This Period (last page this line number only)..... ►

128594.00

Image# 202005019232352518

PAGE 1 / 6380

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12FE4M5

**DCCC**

ADDRESS (number and street)

430 SOUTH CAPITOL STREET, SE

2ND FLOOR

Check if different  
than previously  
reported. (ACC)

WASHINGTON

DC

20003-4024

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00000935

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

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Quarterly Report (Q3)☐ January 31  
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Report (Non-election  
Year Only) (MY)☐ Termination Report  
(TER)(b) Monthly  
Report  
Due On:☐ Feb 20 (M2)☐ May 20 (M5)☐ Aug 20 (M8)☐ Nov 20 (M11)  
(Non-Election  
Year Only)☒ Mar 20 (M3)☐ Jun 20 (M6)☐ Sep 20 (M9)☐ Dec 20 (M12)  
(Non-Election  
Year Only)☐ Apr 20 (M4)☐ Jul 20 (M7)☐ Oct 20 (M10)☐ Jan 31 (YE)

(c) 12-Day

PRE-Election

Report for the:

☐ Primary (12P)☐ Convention (12C)☐ General (12G)☐ Special (12S)☐ Runoff (12R)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y

in the  
State of

(d) 30-Day

POST-Election

Report for the:

☐ General (30G)☐ Runoff (30R)☐ Special (30S)

Election on

M M M /

D D D /

Y Y Y Y Y Y Y

in the  
State of

5. Covering Period

M M M /

D D D /

Y Y Y Y Y Y Y

through

M M M /

D D D /

Y Y Y Y Y Y Y

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

GUINN, LUCINDA, , ,

Type or Print Name of Treasurer

Signature of Treasurer

GUINN, LUCINDA, , ,

[Electronically Filed]

Date

M M M /

D D D /

Y Y Y Y Y Y Y

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Office  
Use  
Only**FEC FORM 3X**  
Rev. 05/2016

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 5608 OF 6380

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

**DCCC**

Full Name (Last, First, Middle Initial)

**A. UNITED PARCEL SERVICE**

Mailing Address PO BOX 7247-0244

City  
PHILADELPHIAState  
PAZip Code  
19170-0001Purpose of Disbursement  
GENERIC CMTE. PROCESSING FEES

Candidate Name

Office Sought: ☐ House  
☐ Senate  
☐ PresidentDisbursement For: ☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Category/  
Type

Date of Disbursement

M	M	M	/	D	D	D	/	Y	Y	Y	Y	Y	Y
0	2			1	4			2	0	2	0		

FEC Identification Number

**C****Transaction ID : SB21B-10091**

Amount of Each Disbursement this Period

15.50

☐ Memo Item

Full Name (Last, First, Middle Initial)

**B. SISNEROS STRATEGIES LLC**

Mailing Address 2208 N. EARLY ST.

City  
ALEXANDRIAState  
VAZip Code  
22302Purpose of Disbursement  
GENERIC STRATEGIC/ POLITICAL CONSULTANT

Candidate Name

Office Sought: ☐ House  
☐ Senate  
☐ PresidentDisbursement For: ☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Category/  
Type

Date of Disbursement

M	M	M	/	D	D	D	/	Y	Y	Y	Y	Y	Y
0	2			1	4			2	0	2	0		

FEC Identification Number

**C****Transaction ID : SB21B-10054**

Amount of Each Disbursement this Period

110175.00

☐ Memo Item

Full Name (Last, First, Middle Initial)

**C. WPP GROUP USA, INC. BREAKTHROUGH CAMPAIGNS**Mailing Address 501 SANTA MONICA BLVD  
SUITE 600City  
SANTA MONICAState  
CAZip Code  
90401Purpose of Disbursement  
GENERIC CMTE. POLLING

Candidate Name

Office Sought: ☐ House  
☐ Senate  
☐ PresidentDisbursement For: ☐ Primary ☐ General  
☐ Other (specify) ▼

State: District:

Category/  
Type

Date of Disbursement

M	M	M	/	D	D	D	/	Y	Y	Y	Y	Y	Y
0	2			1	4			2	0	2	0		

FEC Identification Number

**C****Transaction ID : SB21B-10054**

Amount of Each Disbursement this Period

18900.00

☐ Memo Item**SUBTOTAL** of Disbursements This Page (optional)..... ►**TOTAL** This Period (last page this line number only)..... ►

129090.50